

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

Cause No. 05 CR 1849 JH

ADRIAN SANFORD,

Defendant.

MOTION TO AUTHORIZE OUT OF STATE TRAVEL

COMES NOW the Defendant, Adrian Sanford, by and through his counsel of record, Robert R. Cooper, and respectfully requests that this Court enter an Order authorizing Mr. Sanford to travel out of state and as grounds, Counsel for Defendant states:

1. Mr. Sanford is charged as a co-defendant in a four count Superseding Indictment filed on April 25, 2006.

2. Mr. Sanford is scheduled to travel by airplane on Saturday, August 4, 2007 from his home in Tucson, Arizona to San Diego, California for the purpose of a family vacation. Mr. Sanford is scheduled to return to his home in Tucson, Arizona on Friday, August 10, 2007.

3. Mr. Sanford has maintained contact with the undersigned attorney. Mr. Sanford is not a flight risk.

4. The undersigned counsel has contacted Assistant United States Attorney James Tierney regarding this Motion. Mr. Tierney has indicated that the Government does not oppose this Motion.

5. The undersigned counsel has also contacted United States Probation Officer Gabe Gutierrez regarding this Motion. Mr. Gutierrez does not oppose this Motion.

WHEREFORE, Defendant Adrian Sanford respectfully requests that this Court enter an Order allowing Mr. Sanford to travel by airplane from his home in Tucson, Arizona to San Diego, California for the purpose of a family vacation from Saturday, August 4, 2007 to Friday, August 10, 2007.

/s/

ROBERT R. COOPER
Counsel for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2007, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

James Braun
Assistant United States Attorney
P.O. Box 607
Albuquerque, New Mexico, 87103

/s/

ROBERT R. COOPER